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March 16, 2006

VIA OVERNIGHT COURIER

Robert F. Lopez, Esq.
Hagens Berman Sobol Shapiro LLP
1301 Fifth Avenue, Suite 2900
Seattle, WA 98101

Re: In re Pharmaceutical Indus. AWP Litigation, MDL No. 1456 (D. Mass)

Dear Rob:

This firm represents Dey, L.P. in these consolidated actions. Enclosed with this letter are CDs which Dey is producing in response to the MDL Plaintiffs' request for data obtained by Dey from IMS Health ("IMS").

As you are aware, IMS considers these CDs and the data they contain to be confidential and proprietary to IMS. As such, we have labeled each of these CDs "HIGHLY CONFIDENTIAL" pursuant to the terms of the December 13, 2002 protective order (the "Protective Order"). Consistent with the terms of the Protective Order, and Dey's agreement with IMS (which you have reviewed and the terms of which you agree to abide by) these CDs are being produced for use in this litigation only.

Yours very truly,


Christopher C. Palermo

CCP:cc

Enclosures

cc: All Counsel of Record (via Lexis/Nexis, w/o encs.)